

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

CARPENTERS FRINGE BENEFIT)	
FUNDS OF ILLINOIS, <i>et al.</i> ,)	
)	CIVIL ACTION
Plaintiffs,)	
)	NO. 16 C 3852
vs.)	
)	JUDGE MATTHEW F. KENNELLY
S & S FLOORING INSTALLATION, LLC,)	
an Illinois limited liability company,)	
)	
Defendant.)	

MOTION FOR ENTRY OF DEFAULT AND JUDGMENT

NOW COME Plaintiffs, by their attorneys, and move for entry of judgment by default against Defendant, S & S FLOORING INSTALLATION, LLC, an Illinois limited liability company, in the total amount of \$17,715.35 plus Plaintiffs' court costs and reasonable attorneys' fees in the amount of \$1,610.00.

On April 5, 2016, the Summons and Complaint was served on the Registered Agent by tendering a copy of said documents to her personally at her place of business (a copy of the Summons and Affidavit of Service is attached hereto). Therefore, Defendant's answer was due on April 26, 2016. As Defendant has failed to timely answer the Complaint, Plaintiffs respectfully request entry of default and judgment.

/s/ Cecilia M. Scanlon

CERTIFICATE OF SERVICE

The undersigned, an attorney of record, hereby certifies that she electronically filed the foregoing document (Motion for Entry of Default and Judgment) with the Clerk of Court using the CM/ECF system, and further certifies that I have mailed the above-referenced document by United States Mail to the following non-CM/ECF participant on or before the hour of 5:00 p.m. this 27th day of October 2016:

Ms. Susanna Overton, Registered Agent
S & S Flooring Installation, LLC
125 Autumnwood Lane
Davis Junction, IL 61020

/s/ Catherine M. Chapman

Catherine M. Chapman
Attorney for Plaintiffs
BAUM SIGMAN AUERBACH & NEUMAN, LTD.
200 West Adams Street, Suite 2200
Chicago, IL 60606-5231
Bar No.: 6204026
Telephone: (312) 216-2565
Facsimile: (312) 236-0241
E-Mail: cchapman@baumsigman.com